

February 22, 2018

***Via Electronic Mail***

Ms. Michelle Ramirez  
Environmental Scientist  
Office of Environmental Health Hazard Assessment  
CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY  
1001 I Street  
Sacramento, California 95814

**Re: OEHHA's Notice of Intent to List: TRIM® VX - Proposition 65**

Dear Ms. Ramirez:

Master Chemical Corporation dba Master Fluid Solutions ("MFS") appreciates this opportunity to comment on the California Environmental Protection Agency – Office of Environmental Health Hazard Assessment's ("OEHHA") Notice of Intent to list the discontinued product TRIM® VX pursuant to the Safe Drinking Water and Toxic Enforcement Act of 1986 – commonly referred to as Proposition 65 ("Prop 65"), as a chemical known to the State of California to cause cancer. OEHHA is basing its proposed listing on the National Toxicology Program's ("NTP") conclusions contained in its Final Technical Report for its two-year inhalation study of TRIM® VX pursuant to the Authoritative Bodies listing mechanism. As the manufacturer of the discontinued product, MFS respectfully requests that OEHHA withdraw its Notice of Intent to List TRIM® VX as it is not necessary to do so based on the information contained in this letter.

**Product Availability**

TRIM® VX has been out of production for more than two years. The product is not produced anywhere in the world, therefore the product is not available domestically and cannot be imported or brought into California from any other source. MFS has conducted an exhaustive survey of end-users and distributors of the product to confirm no TRIM® VX can be found anywhere in the supply chain. The product simply cannot be ordered or obtained from any source worldwide.

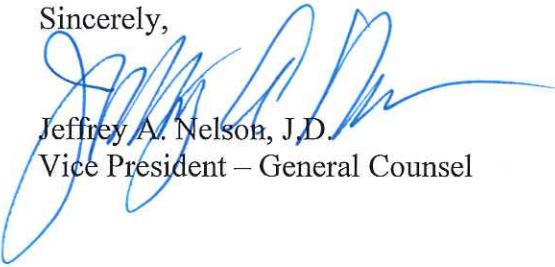
**Review of the Independent Lubricant Manufacturers Association (ILMA)  
Comments**

In addition, MFS has reviewed and agrees wholeheartedly with ILMA's well-reasoned comments dated February 22, 2018, but fully adopting its position is not required because TRIM® VX is no longer in the marketplace. MFS reiterates that TRIM® VX is a unique,

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discontinued product that is no longer in use and is not representative of MWFs generally, including other TRIM<sup>®</sup> branded formulations.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jeffrey A. Nelson", with a long, sweeping horizontal line extending to the right.

Jeffrey A. Nelson, J.D.  
Vice President – General Counsel